

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MASSACHUSETTS PREMIER SOCCER,)
LLC, d/b/a “Global Premier Soccer,”)
Plaintiff)
v.) Civil Action No. 1:20-cv-10430-JCB
SAN DIEGUITO SURF SOCCER CLUB,)
INC., d/b/a “New England Surf Soccer)
Club,” “South Carolina Soccer Club,”)
and “San Diego Surf Soccer Club,”)
LUKE KRAWCZYK, and)
ANDREW PROSSER,)
Defendants,)

)

PLAINTIFF'S EMERGENCY MOTION TO EXPEDITE CERTAIN DISCOVERY

Plaintiff Massachusetts Premier Soccer LLC, d/b/a “Global Premier Soccer” moves to expedite discovery against Defendants San Dieguito Surf Soccer Club, Inc. (d/b/a “South Carolina Soccer Club,” “New England Surf Soccer Club,” and “San Diego Surf Soccer Club”) (“Surf Club”), Luke Krawczyk, and Andrew Prosser. This motion is brought on an expedited basis to address the imminent prospects of irreparable harm.

For reasons set forth in its accompanying memorandum of law and Declaration Keith Caldwell and exhibits thereto, Plaintiff respectfully requests that the Court grant its motion to expedite discovery, requiring Defendants to produce: (1) documents since and including October 2019 concerning and including Surf Club's recruitment of GPS employees, such as but not limited to Prosser and Krawczyk, (2) documents concerning and including the conversion of the

GPS NASA and GPS Coastal Academy pages described in the Complaint and events planned for such locations, (3) the launch of New England Surf Soccer Club, including documents concerning events planned in New England, and (4) depositions of Prosser, Krawczyk and Enge.

Respectfully submitted,

/s/ Phillip Rakhunov
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Dated: March 4, 2020

Certificate of Service and L.R. 7.1 Certification

The undersigned certifies that this document, filed through the ECF system, is being served by email on Brian Enge, the CEO of defendant Surf Club at “brian@surfclubsports.com”; on defendant Luke Krawczyk by email at “LKrawczyk@surfsoccer.com” and by federal express at 223 East Main Street, Rock Hill, SC 29730; and on defendant Andrew Prosser by email at “aprosser@surfsoccer.com” and by federal express at 35 Crescent Street, Apt 1, Waltham, MA 02453, on March 4, 2020.

On March 3, 2020, counsel for GPS emailed Mr. Enge with a copy of the Complaint in this matter, advising Mr. Enge that GPS intends to file emergency motions seeking interim injunctive relief and expedited discovery, and asking for identity of Surf Club’s counsel. On March 4, 2020, counsel for GPS again inquired of Mr. Enge by email as to the identify of defense counsel. As of this date, counsel for GPS has not been made aware of the identity of counsel for any of the defendants or otherwise received a response from Mr. Enge.

/s/ Phillip Rakhunov